

Cyprus | Tax & Legal | 25 September 2024



Cyprus Tax News

Additional FAQs issued by the Cyprus Tax Department with respect to the Transfer Pricing Legislation

On 24 September 2024, the Cyprus Tax Department ("CTD") released additional Frequently Asked Questions (FAQs) on its official website regarding Transfer Pricing (TP).

These additional FAQs (#25 - #43) provide further guidance to taxpayers in complying with TP requirements. The full list of FAQs can be accessed through the CTD's website under the relevant FAQ section.

Deloitte Comments

The new FAQs provide additional guidance on certain matters relating to the completion of the SIT, the use of safe harbours, and simplified TP documentation. Furthermore, there is some additional guidance with respect to the Quality Assurance Review Confirmation ("QARC") issued by licensed firms with respect to Local Files.

The above is helpful for taxpayers who are preparing or will be preparing their SITs, Local Files and simplified TP Documentation or who are using one of the available safe harbours. As a reminder, for taxpayers which have an obligation to prepare a SIT, the extended deadline is currently 30 November 2024 for the tax year 2022 to submit their corporate income tax return (TD4) and SIT, as well as to have their TP Documentation in place. Please see <u>link</u> to our previous tax alert, issued on the 23 February 2024, on this matter.

How can we help?

Deloitte Cyprus can assist clients with understanding the potential impact of the newly issued FAQs, as well as other relevant guidance, on their TP compliance requirements. Furthermore, we can assist with performing transfer pricing analysis, as well as

preparation or review of TP Documentation and SITs, to ensure full compliance with the Cypriot TP legislation.

Get in touch











© 2024 Deloitte Limited

This communication contains information which is privileged and confidential. It is exclusively to the intended recipient(s). If you are not the intended recipient(s), please: (1) notify the sender by forwarding this email and delete all copies from your system and (2) note that disclosure, distribution, copying or use of this communication is strictly prohibited. Any erroneous disclosure, distribution or copying of this email communications cannot be guaranteed to be secure or free from error or viruses.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organisation"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL, NSE and DME do not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte & Touche (M.E.) (DME) is an affiliated sublicensed partnership of Deloitte NSE LLP with no legal ownership to DTTL. Deloitte North South Europe LLP (NSE) is a licensed member of Deloitte Tohmatsu Limited.

Deloitte Limited is the sub-licensed affiliate of Deloitte NSE for Cyprus. Deloitte Limited is among the leading professional services firms in Cyprus, providing audit & assurance, consulting, financial advisory, risk advisory, tax and related services, as well as a complete range of services to international business, through over 700 people in Nicosia and Limassol. For more information, please visit the Deloitte Cyprus' website at www.deloitte.com/cy.

Deloitte Limited is a private limited liability company registered in Cyprus (Reg. No. 162812). Offices: Nicosia, Limassol

To no longer receive emails about this topic please send a return email to the sender with the word "Unsubscribe" in the subject line.